

P.O. Box 400, Grand View, ID 83624 P 800.274.1516 F 208.834.2919

March 29, 2019

Ms. Natalie Creed Hazardous Waste Unit Manager Idaho Department of Environmental Quality 1410 North Hilton Boise, ID 83706

RE: US Ecology Idaho (USEI) Site B - IDD073114654

March Monthly Progress Report on Recovery Actions Related to the November 17, 2018 Explosion at the USEI Site B Facility ("Incident")

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for March 2019. This report details the activities undertaken in the recovery process for the month of March.

Throughout the month of March, USEI has performed various operations to evaluate the facility and bring it back to a state of compliance following the Incident. The actions taken in the month of March are outlined below.

After receiving approval from IDEQ on February 7, 2019, USEI began receiving loads of bulk material for direct landfill on February 8, 2019. Off-load and landfill of all backlogged material that was received at the Rail Transfer Facility between the time of the Incident and approval of the Temporary Authorization, was completed on March 12, 2019. At this time USEI has received another small shipment of railcars. The current rate of receipt of material from the RTF is two trucks per round, four rounds per day.

Inspections – Inspections have been performed as required and documented; any area that could not be entered due to structural damage or due to other safety factors was noted on the inspection form.

In the Quarterly Discrepancy Report for 4th Quarter 2018 USEI reported that a number of inspections were missing due to the Incident. During the removal of the Field Tech Office/Firehouse, USEI attempted to retrieve the missing inspections that were located in the Field Tech Office at the time of the Incident. When the building was accessed on February 15, 2019, it was discovered that the majority of the inspections were destroyed and could not be retrieved. USEI is continuing to assess this and will include an update of which inspections were destroyed in the Quarterly Discrepancy Report for 1st Quarter 2019. The discrepancy report will be submitted by April 30, 2019.



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Leachate Management – USEI has completed leachate inspections and removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas, including those observed in the Evaporation Pond, continue to be in keeping with levels associated with normal operations.

Precipitation – Collected precipitation has been monitored and removed from container storage and RCRA tank areas as needed. All precipitation removed from these areas was discharged to the site surface impoundments for evaporation. All precipitation that could be safely removed from Pad 7 was removed; a small amount of liquid remained in the subcells after each pumping event due to overhead hazards in the area. At this time the remaining small amount of liquid that was being reported on the daily inspections for the area has evaporated due to the warmer, drier weather experienced during March.

Collected precipitation from the Indoor and Outdoor Stabilization facilities that was stored in Tank #3 was sampled on January 29, 2019. Analysis performed on February 5, 2019 (Client ID 983224, Lab Sample ID 19021001-22), was provided to IDEQ in a letter dated February 12, 2019, and confirmed that the liquid meets Land Disposal Restriction requirements. The liquid was discharged to the Evaporation Pond on March 1, 2019.

Collected precipitation is continuing to be removed from the Outdoor Stabilization Facility and collection trenches in front of the Containment Building when needed and is currently being discharged to RCRA Tank #2 for storage. The water will be analyzed once the tank is full. Once the liquid has been characterized, it will be appropriately managed, either through stabilization at the Outdoor Stabilization Facility or evaporation in one of the site surface impoundments.

On January 30, 2019 the sumps for Mix Bin #1 (MBT 1) were accessed for sampling. It was noted that the caps had been blown off both ports and that a large amount of water was present in both the primary and secondary sumps. The water level was not measured but was estimated to be approximately 18 inches deep. It has been determined that it is not safe for personnel to enter the area and pump the water from the sumps at this time, due to impacts from the Incident. No further information on the status of the sump water is available for the month of March.

Container Management – Container movements during the month of March have been submitted to Albert Crawshaw of the IDEQ via email. Containers that become damaged or degraded as a result of the Incident are being managed appropriately by being covered or overpacked as needed. USEI has prepared and shipped loads of containers off-site to begin decreasing the container inventory on site. As of March 26th, six loads of material had been shipped off-site; four loads were shipped to US Ecology in Beatty, NV,one load was shipped to Rhineco, and one load to Veolia - Henderson. USEI has also built three additional loads of material for shipment to the Beatty, NV facility. The shipment date for those loads is unknown at this time.

On March 27, 2019 USEI removed a rolloff container of treated material awaiting post-treatment testing from the stabilization side of the Containment Building. The rolloff was moved to CSA 1

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and sampled for post-treatment analysis. The work orders, field sheets, and manifests for the material have been enclosed for your reference. Containers that were within the debris side of the Containment Building at the time of the Incident remain at that location at this time. The building was released by OSHA on January 29, 2019. USEI is evaluating the building further at this time to prepare a Safe Work Plan for removal of the containers prior to commencing work. A tentative date of April 15, 2019 has been chosen as a start date for container removal. USEI will provide IDEQ a copy of the Safe Work Plan once it has been finalized.

Treatment bins at the Outdoor Stabilization Facility that were in process at the time of the Incident were covered on December 21, 2018. The in-process bins remain covered at this time. The bins are inspected on a daily basis; water is removed from the tarps and they are re-tightened as needed. The waste will be processed as hazardous waste treatment operations at the facility resume.

Evidence Material – Evidence from the Incident remains in storage at Container Storage Area 1 (CSA 1) at this time. This includes tagged debris pieces, various split samples that have been collected, empty drums from the back of the haul truck at the Containment Building, containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), and overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0). All remaining containers of magnesium material from Reade Manufacturing Company, the company whose waste stream was being treated when the explosion occurred, remain on site at this time.

(b) (6), (b) (7)(A), (b) (7)(C)

the timeframe for storage

of these materials is unknown at this time.

Baker Risk has received analytics for samples collected prior to February 1, 2019, and continues to review and analyze these materials in its efforts to determine a cause of the Incident. On February 21, 2019, additional samples were collected and sent to Baker Risk.

Cleanup Material – Cleanup of debris continued through most of January. Gathered tin and larger pieces of foam insulation have been placed into roll-off bins; small pieces of foam were bagged and then placed into roll-off bins. The bins were placed into storage at CSA 1. The majority of material outside the footprint of the Containment Building has been cleaned up at this time. Additional material is being cleaned up as it is identified. On March 28, 2019 cleanup of some equipment inside the Stabilization portion of the Containment Building began. Operators followed a safe work plan while removing the excavator, a lime silo, and the haul truck. Additional cleanup within the fenced area around the Containment Building is still needed. This cleanup effort will be undertaken once overhead hazards and debris that might fall has been removed. All cleanup material will be handled in accordance with the site closure plan.

A small amount of additional foam material was picked up in the desert on the south side of the facility during the first week of January. USEI will continue monitoring the area for additional material. No additional material was identified during the March inspection of the fence.

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Small amounts of additional material continue to be picked up as they are identified. USEI personnel will continue monitoring the fence line on a weekly basis to ensure material is not exiting the facility.

Facility Structures – At this time all of the administration facility structures including the Laboratory and Receiving office building and Women's Decon have been removed and placed into Landfill Cell 15 for disposal. The Laboratory/Receiving office was demolished and transported to the landfill cell for disposal the week of March 18th. The Women's Decon building was removed during the same time period. Due to the size of the Women's Decon building, the roof and walls had to be removed and hauled to the landfill cell for disposal separate from the floors. The roof and walls were removed in a manner that minimized damage to the flooring of the building since portions of the flooring were Category I Asbestos Containing Material. Once the roof and walls were removed, the floor of each section of the trailer was moved and placed into the landfill. Once placed in the landfill, the buildings were covered with inert material and crushed in place.

On January 21, 2019, the PCB Processing Building collapsed due to high wind speeds in light of the damage caused to it by the Incident. The containers of waste material stored in the area were undamaged. On January 23, 2019 all containers were removed to a van trailer for shipment to the US Ecology facility located in Beatty, NV. Once all containers had been removed, the remaining walls and roof were pushed into the footprint and covered with a tarp to eliminate precipitation run-on and run-off to the building footprint. The van load of TSCA containers was shipped to the Beatty, NV facility on February 12, 2019. The building debris was removed from the area and disposed in Landfill Cell 15 on March 5th.

The Containment Building sustained major damage in the Incident and will need to be repaired/rebuilt. An initial evaluation of the structure by the insurance company and a structural engineer was performed on the stabilization side of the Containment Building on January 29, 2019. Steel and other building debris will need to be removed before the slab and foundation can be further evaluated. The Debris Side will be evaluated once debris material and containers have been removed and the pad is visible for inspection. US Ecology has retained ABCO Engineers to act as project managers on the removal/closure and reconstruction of the Containment Building facility. Contact information for ABCO Engineers was provided to Mr. Lon Stewart via email on February 27, 2019.

The chain link fencing remains intact around the Containment Building, the administration building complex, and the secured area in CSA 1.

The site vehicle wash building was removed January 8, 2019. Water to the truck wash area was restored on January 16, 2019. Up to January 16, 2019 a portable water source was needed to operate the pressure washer. USEI has received a quote for reconstruction of the Truck Wash building, as well as approval from the insurance adjuster to proceed to rebuild the building. The start date for this project is unknown at this time. However, Pad 7 has been evaluated by USEI's contractor ESI so that all materials needed for repair could be ordered.

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The site water system was partially evaluated/repaired on January 16, 2019. One water tank is fully functional and is being used to supply water to the truck wash area. Broken lines at the administration/decon areas were capped during the evaluation and repair on January 16. Further evaluation of the remainder of the water tanks and water system piping are still needed. USEI has received a quote for reconstruction of the Pump House building. USEI's insurance adjuster has given their approval to proceed with the rebuild of the building. The start date for this project is unknown at this time.

Some buildings, such as Pad 7 and the new maintenance shop are structurally sound but will require a large amount of repair in light of damage sustained in the Incident. Repairs on the new shop building began on January 21, 2019 and will continue until complete. All damaged siding and other components have been removed from the shop at this time and reconstruction has begun. The timeframe for repairs to Pad 7 is unknown at this time.

The Old Shop/Quonset hut was previously reported to be minimally damaged. The building was shored up by USEI's contractor NorthStar on January 16, 2019. The building was evaluated by USEI's insurance adjuster on January 29, 2019 and was determined to be a total loss. The building will continue to be used for storage of items until repairs to the New Shop are complete. Items will be removed to the New Shop once repairs are completed by USEI's contractor. During the week of March 18th the wood-framed offices and conference room upstairs and on the east end of the Quonset hut were removed and placed into Landfill Cell 15. The outer shell of the Quonset hut remains in place at this time. The plan at this time is to replace the metal siding on the Quonset hut and continue to use it for maintenance storage.

The Outdoor Stabilization Facility office is currently being used to house the fingerprint lab in the near term. A tentative design for the site laboratory has been drawn up. The new laboratory building will be located south of the main administration office in the new office complex, located near the front gate.

A portable shower/toilet unit located in the temporary administration trailer area was put into service on January 10, 2019. The unit contains four separate shower/toilet/sink stations. An additional unit with two more restroom stations (toilet/sink only) is present in the area and has been hooked up to power that was supplied to the area.

Facility Personnel – Since USEI's last report an additional employee, Jackie Prow, has left employment with USEI. An updated facility employee list is included with this letter.

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If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,

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Jason Evens General Manager

cc: Barbara McCullough, EPA Region 10

Albert Crawshaw, IDEQ
Peter Purchase, IDEQ
Brian Gaber, IDEQ
Curt Ohlsen, IDEQ
Lon Stewart, IDEQ
Andrew Marshall, USE

Enclosure

USEI Employee List March 29, 2019

	Team Member	Hire Date	Title
	Tran	sfer, Storage, Di	isposal Facility
]	BAILEY, NOEL	12/29/2003	Technical Manager
2	BIRMINGHAM, JACK	5/12/2003	Operations Supervisor
5	CERECERES, TINO	5/15/2006	Approvals Coordinator
4	CHRISTIANSEN, RICK	8/2/1992	Sr Operator
5	CLARK, DAVID	4/8/2013	Customer Service Specialist
6	CLARK, SHILO	9/17/2018	Security officer
7	CUTLER, ROBERT	8/26/2010	Senior Operator
8	EVENS, JASON	3/6/2017	General Manager
9	FERRELL, CASEY	8/19/2002	Lead Operator - landfill
C	HALL, STEPHANIE	6/1/2006	Chemist
1	HARLAN, RACHEL	9/4/2018	Receiving Coordinator
2	HAZELL, LEE	7/25/2011	Operator
3	HERRERA, FREDY	1/11/2016	Operator
4	HOGABOAM, REBECCA	6/1/2015	EH&S Compliance Manager
5	IRELAND, JOSEPH	9/28/2007	Mechanic
6	JENSEN, JUSTIN	2/16/2015	Rad Safety Specialist
7	LAWSON, AYLA	8/21/2017	Receiving Coordinator
8	LAWSON, DEVANI	10/22/2007	Lab Tech
9	LEONARD, CHET	5/1/2006	Senior Operator
0	LINDQUIST, ROBERT	9/1/1999	Mechanic Supervisor
1	LIVINGSTON, SOPHIE	7/21/2008	Transportation Clerk
2	LUTRELL, JENNIFER	12/8/2014	Customer Service Specialist
3	MAGERS, JUDITH	6/14/2006	Office Administrator
4	MARTINEZ, DANIEL	4/4/2005	Operations Supervisor
5	POLLARD, RICKEY	4/15/1987	Operator
7	RESNER, ROBERT	3/23/2015	Operator
3	ROBERSON, KENNETH	9/6/1988	Operation Manager
•	RODRIGUEZ, CYNTHIA	6/7/2010	Receiving Coordinator
)	ROGERS, BENJAMIN	6/20/2006	Operator
	SCHMITZ, CORIAN	2/28/2005	Receiving Lead
	SCHWAGER, ELIZABETH	4/26/2010	HR Generalist
3	SIMPER, KARLITA	6/13/2011	EH&S Compliance Specialist
	VANCE, ROBERT	6/7/1993	Lead Operator
И	WHITTED, DALE	6/28/2005	Mechanic
	WILSON, DANIEL	1/17/2011	Senior Operator
и	WOODRUFF, DANE	10/31/2005	Operator
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1	HACTINGS JONNIN	Rail Facili	
в	HASTINGS, JONNY	7/16/2018	Mechanic
1	LOPES, JOAO	9/4/2007	Operator
1	MONASERIO, JOSH	7/25/2005	Lead Operator
1	MORENO, ANDREW	12/2/1996	Operations Supervisor/ Rail Forman
ı	SPENCER, JUSTIN	9/25/2007	RTF Operations Supervisor
1	WININGS, ANDY	7/25/2011	Operator

Team Members that have left the Company as of 3/29/2019:

1 BONECHER, BRENTON 11/23/2015 Operator

2 DARKES, CASANDRA 5/30/2017 Lab Technician

3 DESBIEN, DARRIN 7/29/2013 Operator

8/22/2016	Operator
1/17/2011	Operator
8/10/2015	Operator
8/15/2011	Senior Operator
11/9/1987	Operation Supervisor
8/2/2004	Sr Operator
8/28/2017	Operator
10/1/2003	Mechanic
4/11/1988	Sr. Operator
5/16/2016	Lab Technician
	1/17/2011 8/10/2015 8/15/2011 11/9/1987 8/2/2004 8/28/2017 10/1/2003 4/11/1988

Roll-off Container Information March 29, 2019

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Recipe								
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I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Approved for Disposal by

Date:

Time: /500

P2 MV7917 1117118

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1510080495 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 1. Generator ID Number 2. Page 1 of 4. Manifest Tracking Number UNIFORM HAZARDOUS 3. Emergency Response Phone 006034834 WASTE MANIFEST ORD076414135 (800) 839-3975 5. Generator's Name and Mailing Address ERICKSON AIR-GRANE INC STON WILLOW CORINGERO 6, Transporter 1 Company Name. U.S. EPA ID Number STEVE FORLER TRUCKING INC. JDR000205825 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address U.S. EPA ID Number U.S. ECOLOGY IDAHO, INC. Facility's Phone 6300 274 1516 IDD073114654 ID6-83624 - 21 1 1 10 10 10 10 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unit and Packing Group (if any)) 13. Waste Codes HM Quantity Wt./Vol. Type RO, UN3288, WASTE TOXIC SQUID INORGANIC N.O.S. (CADMIUM. GENERATOR LE CHROMUND 6.1. PG. L. MINISTER WILL D00 14. Special Handling Instructions and Additional Information PROFILER 47333-0 RO-1LES IN CASE OF EMERGENCY CONSULT DOTHER CHASE 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/blacarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name. International Shipments Import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of M Transporter 2 Printed/Typ Sec 11. Using USET WIST Sec 15 James Houtsdal all okpu James Moutsdale via telecan 10/11/18
Quantity. Partial Rejection SECTI TOTAL QTY MISSING, SEC 15 GEN SIG & DATE MISSING, EL-LDR, NO LOR W/ MANIFEST. Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) d Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Month

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